

1 REBECCA L. MASTRANGELO, ESQ.

Nevada Bar No. 5417

2 ROGERS, MASTRANGELO, CARVALHO & MITCHELL

700 S. Third Street

3 Las Vegas, NV 89101

Telephone: (702) 383-3400

4 Facsimile: (702) 384-1460

rmastrangelo@rmcmlaw.com

5 Su-Lyn Combs (*pro hac vice*)

6 TUCKER ELLIS LLP

515 South Flower Street

7 Forty-Second Floor

Los Angeles, CA 90071

8 Telephone: (213) 430-3400

Facsimile: (213) 430-3409

9 su-lyn.combs@tuckerellis.com

10 Attorneys for Defendant

OTIS ELEVATOR COMPANY

11 UNITED STATES DISTRICT COURT

12 DISTRICT OF NEVADA, SOUTHERN DIVISION

13
14 SEBASTIAN SYMEONIDES, an Individual,

15 Plaintiff,

16 vs.

17 TRUMP RUFFIN COMMERCIAL, LLC, a
18 Foreign Limited-Liability Company d/b/a
19 TRUMP INTERNATIONAL LAS VEGAS
20 and TRUMP INTERNATIONAL HOTEL &
21 TOWER LAS VEGAS; TRUMP RUFFIN
22 TOWER I, LLC, a Foreign Limited-Liability
23 Company; TRUMP INTERNATIONAL
24 HOTELS MANAGEMENT, LLC, a Foreign
25 Limited-Liability Company; OTIS
26 ELEVATOR CORPORATION, a Foreign
27 Corporation; DOES I through X, inclusive;
28 and ROE BUSINESS ENTITIES I through
XX, inclusive,

Defendants.

Case No. 2:23-cv-00854-JAD-MDC

**STIPULATION AND ORDER TO
EXTEND DEFENDANTS' DEADLINE TO
REPLY TO PLAINTIFF'S OPPOSITION
TO DEFENDANT OTIS ELEVATOR
COMPANY'S MOTION FOR SUMMARY
JUDGMENT AND JOINDER THERETO
OF DEFENDANTS TRUMP RUFFIN
COMMERCIAL, LLC, D/B/A TRUMP
INTERNATIONAL LAS VEGAS AND
TRUMP INTERNATIONAL HOTEL &
TOWER LAS VEGAS, AND TRUMP
INTERNATIONAL HOTELS
MANAGEMENT, LLC**

ECF No. 79

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Case No. 2:23-cv-00854-JAD-MDC

STIPULATION AND [PROPOSED] ORDER TO EXTEND DEFENDANTS' DEADLINE TO REPLY TO PLAINTIFF'S OPPOSITION TO
DEFENDANT OTIS ELEVATOR COMPANY'S MOTION FOR SUMMARY JUDGMENT AND JOINDER THERETO OF DEFENDANTS
TRUMP RUFFIN COMMERCIAL, LLC, D/B/A TRUMP INTERNATIONAL LAS VEGAS AND TRUMP INTERNATIONAL HOTEL &
TOWER LAS VEGAS, AND TRUMP INTERNATIONAL HOTELS MANAGEMENT, LLC

1 IT IS HEREBY STIPULATED AND AGREED, by all parties, by and through their
 2 respective counsel of record, that the deadlines for Defendant Otis Elevator Company (“Otis”) and
 3 Defendants Trump Ruffin Commercial, LLC, d/b/a Trump International Las Vegas and Trump
 4 International Hotel & Tower Las Vegas, and Trump International Hotels Management, LLC
 5 (“Trump Hotel”) (collectively, “Defendants”) to file their replies to Plaintiff Sebastian Symeonides’
 6 opposition to Otis’ motion for summary judgment and Trump Hotel’s substantive joinder to Otis’
 7 motion for summary judgment, currently due March 3, 2025, shall be extended to March 17, 2025.

8 Otis filed its motion for summary judgment on January 13, 2025. Dkt. 54. Trump Hotel
 9 filed a joinder to Otis’ motion on January 17, 2025. Dkt. 58. Plaintiff filed his opposition to Otis’
 10 motion and Trump Hotel’s joinder on February 17, 2025. Dkt. 62.

11 On February 18, 2025, the parties agreed to extend the deadline for Defendants to file their
 12 replies to Plaintiff’s opposition to Otis’ motion for summary judgment and Trump Hotel’s joinder.

13 Good cause exists for this request because Otis’ motion for summary judgment, Trump
 14 Hotel’s joinder, and Plaintiff’s arguments in opposition thereto involve complex legal and factual
 15 issues. *See, e.g.*, Dkts. 54-1 to 54-11; 63-76. Properly addressing arguments against Otis’ motion
 16 for summary judgment and Trump Hotel’s joinder requires a thorough review of extensive records,
 17 expert reports, deposition testimony, and case law to ensure the Court receives well-reasoned and
 18 comprehensive arguments. *Ibid.*

19 The Court previously granted an order stipulating an extension of time for Plaintiff to oppose
 20 Otis’ motion for summary judgment on identical good cause grounds as stated above. Dkts. 59-60.

21 This requested extension is made in good faith, and not for purposes of delay.

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Respectfully submitted,

Dated this 24th day of February, 2025

CHRISTIANSEN TRIAL LAWYERS

/s/ R. Todd Terry

PETER CHRISTIANSEN, ESQ.

Nevada Bar No. 5254

R. TODD TERRY, ESQ.

Nevada Bar No. 6519

KEELY P. CHIPPOLETTI, ESQ.

Nevada Bar No. 13931

710 South 7th Street

Las Vegas, NV 89101

Attorneys for Plaintiff

Dated this 24th day of February, 2025

LEWIS BRISBOIS BISGAARD &
SMITH LLP

/s/ David B. Avakian

JOSH COLE AICKLEN, ESQ.

Nevada Bar No. 7254

DAVID B. AVAKIAN, ESQ.

Nevada Bar No. 9502

YILMAZ E. TURKERI, ESQ.

Nevada Bar No. 15468

6385 S. Rainbow Blvd., Suite 600

Las Vegas, NV 89118

Attorneys for Defendant

Trump Ruffin Tower I, Trump International

Las Vegas and Trump International Hotel

& Tower Las Vegas and Trump International

Hotels Management, LLC

Dated this 24th day of February, 2025

ROGERS, MASTRANGELO, CARVALHO
& MITCHELL

/s/ Rebecca L. Mastrangelo

REBECCA L. MASTRANGELO, ESQ.

Nevada Bar No. 5417

700 South 3rd Street

Las Vegas, NV 89101

*Attorneys for Defendant Otis Elevator
Company*

Dated this 24th day of February, 2025

TUCKER ELLIS LLP

/s/ Su-Lyn Combs

SU-LYN COMBS, ESQ. (*Pro Hac Vice*)

515 South Flower Street


Forty-Second Floor

Los Angeles, CA 90071

*Attorneys for Defendant Otis Elevator
Company*

ORDER

Based on the parties' stipulation [ECF No. 79] and good cause appearing, IT
IS HEREBY ORDERED that **the deadline** of Defendant Otis Elevator Company and Defendants
Trump Ruffin Commercial, LLC, d/b/a Trump International Las Vegas and Trump International
Hotel & Tower Las Vegas, and Trump International Hotels Management, LLC, to reply or respond
to Plaintiffs' opposition to Otis' motion for summary judgment and Trump Hotel's joinder thereto,
is extended to March 17, 2025.



United States District Court Judge

Dated: 2/27/25